

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)  
ECF Case

*This document relates to:*

*All Actions*

**NOTICE OF PLAINTIFFS' APPLICATION FOR ATTORNEYS'  
FEES AND EXPENSES PURSUANT TO REPORT AND RECOMMENDATION  
OF OCTOBER 28, 2013**

PLEASE TAKE NOTICE that, pursuant to the Court's Memorandum Decision and Report and Recommendation of October 28, 2013 (ECF No. 2789), upon the memorandum of law attached hereto and the supporting declaration of Robert T. Haeefele and Exhibits attached thereto, Plaintiffs, by and through the undersigned counsel for the Plaintiffs' Executive Committees of 03 MDL 1570, will move the Court, before the Honorable Frank Maas, U.S.D.J., at the United States District Court, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 740, New York, New York, 10007-1312, on a date and time to be determined by the Court.

Dated: January 24, 2014

Respectfully submitted,



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Robert T. Haeefele, Esq.  
MOTLEY RICE, LLC  
28 Bridgeside Boulevard  
Mount Pleasant, SC 29464  
Tel: (843) 216-9000

On behalf of the MDL 1570 Plaintiffs'  
Executive Committees

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Plaintiffs' Application for Attorney's Fees and Expenses Pursuant to Report and Recommendation of October 28, 2013 was served via ECF filing, this 24<sup>th</sup> day of January 2014, upon:

Alan R. Kabat, Esq.  
Bernabei & Wachtel, PLLC  
1775 T Street, N.W.  
Washington, D.C. 20009-7124

(Counsel for Al Haramain and Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)

And

Martin McMahon, Esq.  
MARTIN F. McMAHON & ASSOCIATES  
1150 Connecticut Avenue, N.W.  
Suite 900  
Washington, DC 20036  
(Counsel for Wa'el Jelaidan)



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Robert T. Haefele, Esq.